

Ahilan T. Arulanantham (SBN 237841)  
arulanantham@law.ucla.edu  
CENTER FOR IMMIGRATION LAW AND  
POLICY, UCLA SCHOOL OF LAW  
385 Charles E. Young Dr. East  
Los Angeles, CA 90095  
Telephone: (310) 825-1029

Emilou H. MacLean (SBN 319071)  
emaclean@aclunc.org  
Michelle (Minju) Y. Cho (SBN 321939)  
mcho@aclunc.org  
Amanda Young (SBN 359753)  
ayoung@aclunc.org  
ACLU FOUNDATION  
OF NORTHERN CALIFORNIA  
39 Drumm Street  
San Francisco, CA 94111-4805  
Telephone: (415) 621-2493  
Facsimile: (415) 863-7832

Attorneys for Plaintiffs  
*[Additional Counsel Listed on Next Page]*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS MOLINA, JHONY SILVA, MARIA ELENA HERNANDEZ, O.C., SANDHYA LAMA, S.K., TEOFILO MARTINEZ,

Case No. 3:25-cv-05687-TLT

## **PLAINTIFFS' NOTICE OF RELATED CASES**

*Plaintiffs,*

V.

KRISTI NOEM, in her official capacity as Secretary of Homeland Security, UNITED STATES DEPARTMENT OF HOMELAND SECURITY, and UNITED STATES OF AMERICA,

### *Defendants.*

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)

3 jessica@ndlön.org

4 Lauren Michel Wilfong (*Pro Hac Vice*)

5 lwilfong@ndlön.org

6 NATIONAL DAY LABORER ORGANIZING NETWORK

7 1030 S. Arroyo Parkway, Suite 106

8 Pasadena, CA 91105

9 Telephone: (626) 214-5689

10 Eva L. Bitran (SBN 302081)

11 ebitran@aclusocal.org

12 Diana Sanchez (SBN 338871)

13 dianasanchez@aclusocal.org

14 ACLU FOUNDATION

15 OF SOUTHERN CALIFORNIA

16 1313 West 8th Street

17 Los Angeles, CA 90017

18 Telephone: (213) 977-5236

19 Erik Crew (*Pro Hac Vice*)

20 ecrew@haitianbridge.org

21 HAITIAN BRIDGE ALLIANCE

22 4560 Alvarado Canyon Road, Suite 1H

23 San Diego, CA 92120

24 Telephone: (949) 603-7411

25

26

27

28

## Background

Plaintiffs filed the instant case on July 7, 2025. On the Civil Cover Sheet, Plaintiffs identified two related cases in this district: *National TPS Alliance, et al. v. Kristi Noem, et al.*, No. 3:25-cv-01766 and *Ramos, et al. v. Nielsen, et al.*, No. 3:18-cv-1554. Dkt. 1-1.

Pursuant to Local Rule 3-12(b), Plaintiffs simultaneously filed in *Ramos v. Nielsen* (the lowest-numbered case) an Administrative Motion to Consider Whether Cases Should be Related. *Ramos*, Dkt. 264.

On July 8, 2025, this Court ordered Plaintiffs to provide the Court with notice of any related cases that are pending in federal court no later than July 11, 2025. Dkt. 27.

On July 9, 2025, this Court referred this case to the Honorable Edward M. Chen for consideration of whether this case is related to *National TPS Alliance, et. al., v. Trump, et. al.*, Case No. 3:25-cv-01766-EMC (N.D. Cal. filed February 19, 2025).

On July 11, 2025, Judge Chen denied Plaintiffs' Motion to Consider Whether Cases Should be Related. *Ramos*, Dkt. 267.

Pursuant to this Court's July 8, 2025 Order, Dkt. 27, Plaintiffs hereby file this notice to provide the Court with notice of any related cases that are pending in federal court.

### **Related Cases**

Plaintiffs in this case challenge unlawful decisions to end Temporary Protected Status protections in violation of the Administrative Procedure Act (APA) and the Fifth Amendment of the United States Constitution. Plaintiffs allege that Defendants have made a preordained, political decision to terminate TPS designations wholesale, and that the terminations of TPS for Honduras, Nepal, and Nicaragua were based on this preordained decision rather than the objective country conditions review required by statute. *See* Complaint, Dkt. 1 ¶¶ 152-57.

In addition to *National TPS Alliance, et al. v. Kristi Noem, et al.*, No. 3:25-cv-01766 and *Ramos, et al. v. Nielsen, et al.*, No. 3:18-cv-1554, Plaintiffs are aware of the following pending cases outside of this district that raise APA and/or Fifth Amendment challenges to Defendants' TPS decisions:

- *HECA, et. al., v. Trump, et. al.*, Case No: 1:25-cv-01464 (E.D.N.Y. filed March 14, 2025)

- (challenging vacatur and termination of TPS for Haiti)
- *Haitian Americans United, et. al. v. Trump, et. al.*, Case No: 1:25-cv-10498 (D. Mass filed March 3, 2025) (challenging vacatur and termination of TPS for Haiti and Venezuela)
  - *CASA, et. al. v. Noem, et. al.*, Case No 8:25-cv-00525-GLR (D. Md. filed March 3, 2025) (challenging vacatur and termination of TPS for Venezuela)
  - *CASA, et. al. v. Noem, et. al.*, Case No. 8:25-cv-1484 (D. Md. filed May 7, 2025) (challenging termination of TPS for Cameroon and Afghanistan).<sup>1</sup>

Date: July 11, 2025

Respectfully submitted,

NATIONAL DAY LABORER ORGANIZING  
NETWORK

/s/ Jessica Karp Bansal  
Jessica Karp Bansal

Lauren Michel Wilfong (*Pro Hac Vice*)  
NATIONAL DAY LABORER ORGANIZING  
NETWORK

Emilou MacLean  
Michelle (Minju) Y. Cho  
Amanda Young  
ACLU FOUNDATION  
OF NORTHERN CALIFORNIA

Ahilan T. Arulanantham  
CENTER FOR IMMIGRATION LAW AND  
POLICY, UCLA SCHOOL OF LAW

Eva L. Bitran  
Diana Sanchez  
ACLU FOUNDATION  
OF SOUTHERN CALIFORNIA

Erik Crew (*Pro Hac Vice*)  
HAITIAN BRIDGE ALLIANCE

Attorneys for Plaintiffs

---

<sup>1</sup> This list does not include cases filed to challenge TPS terminations during the first Trump Administration, as those cases are no longer pending. The sole exception is *Ramos*, which remains pending because the court has yet to resolve the parties' dispute over attorneys' fees.

1  
2                   **CERTIFICATE OF SERVICE**  
3

4                   I hereby certify that on July 11, 2025, I caused the foregoing to be electronically filed with  
5 the Clerk of Court using the CM/ECF system, which will then send a notification of such filing  
6 (NEF) to all counsel of record.  
7

8                   NATIONAL DAY LABORER ORGANIZING  
9                   NETWORK  
10

11                   \_\_\_\_\_  
12                   /s/ *Jessica Karp Bansal*  
13                   Jessica Karp Bansal  
14

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28